

IN UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO

FILED

**Fredrick Bolden
Plaintiff**

MAR 08 2022

1:22 CV 380

-vs-

**CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND**

JUDGE BRENNAN

University Hospitals Cleveland & Richmond Medical Centers of Ohio

David Yeunsik Hahn MD

Puja Kumar MD

Defendant(s)

MAG. JUDGE BAUGHMAN

CASE NUMBER:

CIVIL COMPLAINT OF PLAINTIFF RESPONSE TO THE NOTION TO DISMISS THE CASE.

This case was brought before the honorable judge of THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO by Plaintiff against University Hospitals Cleveland and Richmond Medical Centers of Ohio for non su juris jurisdiction for the reconsideration of the discrimination, negligence, infringement, and/or malpractice of his Civil Rights.

The plaintiff pleads that this honorable Court of Law, Seeks Civil motion and ordinance for him, on the following counts.

COUNT I

This case is brought by the Plaintiff against the Defendant(s) University Hospitals Cleveland and Richmond Medical Centers is commissioned under the state of Ohio for alleged inhumane treatment and punitive damages which is in violation of the Civil Human Rights Act of 1964 42 U.S.C 2000, et seq. with companion claims pursuant to the Ohio Civil Rights Act ("OCRA"). O.R.C 2315.21 near death experience, deprivation of federal constitutional and statutory rights. Plaintiff seeks compensatory and punitive damages of the sum of \$10,000,000. (Ten Million Dollars).

COUNT II

Plaintiff at this moment incorporates by reference the allegations stated in count III below as if they were fully written herein.

COUNT III

Defendant(s) University Hospitals violated Plaintiff's right to equality in public places, discriminated against Plaintiff neglecting Plaintiff's reason for visiting emergency department and its severity, neglecting Plaintiff's emergency department express care prescreening, pre-visit, referral, and physical health emergency. Defendant(s) lacked situational awareness, which is a code, rule, and/or violation of the Health Insurance Portability and Accountability Act during patient engagement, registration, check-in and/or orientation. Defendant(s) failed to screen and diagnose Plaintiff during reason for visit which have done nothing but led to many forms of unnecessary pain, suffering, and life threatening risks and in the process violating his civil rights. Defendant(s) were being very chaotic, unprofessional, and disorganized, Defendant(s) intentionally tried to commit and prescribe mental health treatment instead of attending to Plaintiff's physical emergency and reason for visit.

COUNT IV

The Defendant(s) failed to medically screen and diagnose Plaintiff for any physical medical problems that would interfere with his day-to-day life. The Defendant(s) didn't deliver sub-standard care to Plaintiff. The Defendant(s) misdiagnosed Plaintiff, made serious medical errors, carelessly prescribed treatment, caused usual delays in treatment that caused near death experience, has led to prolonged serious injuries, and violated standards of care and Plaintiff's civil rights.

COUNT V

Plaintiff seeks aggravated, compensatory, exemplary, financial, and/or punitive damages in the amount of \$10,000,000 (Ten Million Dollars), mental and physical justice owing to the discrimination and/or negligence carried out against him by the Defendant(s) as indicated above that has and/or may cause him to experience headache, eye irritation, swelling, blindness, pain and suffering, numbness, and/or optical muscle and nerve damage.

Additional symptoms include difficulty in sleeping, lesions, tingling, and dialation among other problems resulting from the discrimination against plaintiff, Plaintiff's reason for visiting emergency room(s), mental disability, and civil rights.

COUNT VI

Defendant(s) University Hospitals Cleveland & Richmond medical centers didn't ensure the highest level of service to Plaintiff during emergency visit, wasn't skilled in a situation, didn't address individual and organizational training or industry best practices. The Plaintiff will like this honorable Court give him a proper hearing on his civil notion and see to it that justice is served in this case.

Date: March 8, 2022
By Fredrick Bolden

Plaintiff in Pro Per
Sign.....
